

## Page 8 of 13

82

**July 1997**

[illegible]

Customer	Customer PON	ASR TO BELL	FOC Received	Number Of Business Days From ASR to FOC	Original GDD	Actual Migration Complete	Remarks
							o 8/8/97 - Sprint's Business Consultant called Diane Salters, BellSouth. Salters stated that the facilities were not available and new facilities would not be available until 9/4/97.
							o Mildred Graham, Sprint Manager, spoke with BellSouth about the facility problem. A decision was made to change the due date to 8/13/97 because of the facility problem.
							o 8/12/97 - BellSouth contacted Sprint stating that they (BellSouth) were trying to meet the 8/13/97 due date, but most likely the migration would be completed by noon on 8/14/97.
							o 8/12/97 - BellSouth discovered a cable problem and notified Sprint, also a utility permit was required. Facility permits require a 48 hour notice, but an expedite would be requested. The due date was changed to 8/18/97 due to BellSouth's facility delay.
							o 8/13/97 - Received an FOC changing the due date to 8/18/97.
							o 8/15/97 - Customer migration completed.

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EXHIBIT "T"

## BellSouth FACILITIES PROBLEMS

September 1997

**(FOC = Firm Order Confirmation)**

**(ASR = Access Service Request)**

**(PON = Purchase Order Number)**

Customer	Customer ID	ASR TO BELL	FOC Received	Number Of Business Days from ASR to FOC	Original CDD	Actual Migration Date	Remarks
Customer A	OTC.ds1	09/28/97			09/28/97	10/01/97	<ul style="list-style-type: none"> <li>o An ASR was submitted to BellSouth on 9/26/97. This request was for a T1/access service.</li> <li>o BellSouth and Sprint participated in a conference call. BellSouth stated their policy regarding any access request which was sent through their ICSC Department, received 0-4 days prior to the migration date would not have an FOC issued, but BellSouth would commit to expediting and processing the order the day the order was received. Also, BellSouth committed to notification of Sprint 24 hours prior to the migration date of any facility problems or unavailability.</li> </ul>

Customer	Customer FOC	ASR to BELL	FOC Received	Number Of Business Days from ASR to FOC	Original ODDD	Actual Migration Complete	Remarks
Customer A (Cont..)							o FOC was not received, because of BellSouth's policy on access orders.
							o 9/29/97 - BellSouth failed to notify Sprint of facility problems until the date of migration (9/29/97). BellSouth did not give an estimated date the facilities would be be available.
							Sprint notified BellSouth several times prior to 9/29/97 to verify if facilities were available. Sprint was not notified of the facility problem until the day of migration.
							o BellSouth failed in their commitment to notify Sprint 24 hours prior to customer migration of facility problems.
							o The customer migrated on 10/1/97. This was two days after the original customer desired due date.

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EXHIBIT "I"

# **EXHIBIT “J”**

## EXHIBIT "J"

Page 1 of 2



Melinda Clow  
Director, Local Market Integration

Local Market Integration  
c/o Sprint Long Distance  
Atlanta, GA 30331  
Phone: 404.875.1111  
Fax: 404.875.1111  
melinda.clow@sprint.com

May 19, 1997

Ms. Carol Jarman  
Director- Sprint Account Team  
BellSouth Interconnection Services  
Suite 440  
Two Chase Corporate Drive  
Birmingham, AL 35244

Dear Carol:

Thank you for your May 2 letter following up on the status of the "DACS-mapped integrated SLC" provisioning issue which has delayed the installation of several Sprint Metropolitan Networks (SMNI) customer orders. My response is for the purpose of providing clarification as to what the issue is and why its resolution is critical.

SMNI has placed unbundled loop service orders with BellSouth for several customers where the customer is currently provisioned by BellSouth utilizing a DACS-mapped integrated SLC-- essentially a "pair gain" device employed by BellSouth to maximize facility utilization. In attempting to provision unbundled loops for SMNI, BellSouth discovered that its systems and procedures did not support re-use of the existing facilities. Further, BellSouth did not have additional facilities available to turn up the unbundled loops ordered by SMNI. BellSouth then chose not to construct additional facilities in lieu of resolving the underlying systems and procedural issues in order to turn up the unbundled loops for SMNI. The result is that of the three service orders referenced in my 4/18 letter, two SMNI service installations were significantly delayed. The third installation was completed without the use of the SLC.

We have been advised by BellSouth personnel that these installations were completed for testing purposes only and that no additional installations of this type will be completed until BellSouth's procedural issues have been resolved. Moreover, we have been told that DACS-mapped integrated SLC provisioning configurations are widely-deployed throughout BellSouth meaning that SMNI will likely continue to encounter customers whose provisioning raises the same issues.

## EXHIBIT "J"

Page 2 of 2

Sprint appreciates BellSouth's desire to seek long term systems and process solutions for provisioning these services. However, our request is that future unbundled loop orders under this provisioning scenario be installed utilizing whatever interim procedures are necessary to complete the service order installations within mutually established intervals. This will enable BellSouth and Sprint to make progress toward our mutual goal of on-time service installations.

Carol, we would appreciate BellSouth's response to the request outlined above by Friday, May 30. Thanks again for your update, and I look forward to your response.

Sincerely,



Melissa L. Closs  
Director - Local Market Development

cc: George Head- Sprint  
Richard Warner- Sprint  
Joe Baker- BellSouth



# **EXHIBIT “K”**

# EXHIBIT "K"

Page 1 of 4  
AFFIDAVIT

STATE OF FLORIDA           )  
  )  
COUNTY OF ORANGE        )

I, Julia Downs, based on information and belief, state and allege the following:

I am the Director of Human Resources and Administration for WMFE, Channel 24, the public television station for Orlando, and 90.7 on the FM dial, the public radio station. WMFE has 12 PBX trunk lines and 32 "B1" business lines, including one fifteen line rotary group, one three line rotary group and 14 private lines. During the summer of 1996 we were approached by Sprint Metropolitan about the possibility of switching our local telephone service from Southern Bell. We made the decision to switch because of the substantial savings we could receive by switching to SMNI. We also believed that switching from Southern Bell to SMNI would be transparent to us at WMFE and to those calling WMFE.

Our original cutover date from Southern Bell was scheduled for October 17, 1996. I was scheduled to be out of town October 18, so I requested that we postpone the cutover in case there were any problems. The rescheduled cutover date was November 7, 1996, however, for some unknown reason BellSouth disconnected all service to WMFE during the early morning hours on October 22, 1997. It took three days to get service totally restored to WMFE with the work being completed one day before the commencement of our radio membership drive, which is totally dependent on telephone calls to generate revenue.


During the rescheduled cutover only 13 of the lines could be cutover because of technical problems on BellSouth's end. This resulted in a second cutover date of November 13, 1996. On that date BellSouth had a service technician and a supervisor on site to assist with the cutover. Both were professional and efficient in working with me and with SMNI, and we were able to cutover the remaining 30 lines.

In addition our telephone number was temporarily eliminated from BellSouth's directory assistance. We discovered this quite accidentally, when a caller pointed this out to us.


There were times when I thought maybe we should go back to BellSouth, but I just don't want to reward them for what I believe to be unexplained and inexcusable behavior. It's a matter of principle.

Attached to my affidavit is a memo I wrote to our President, Steve Steck, when I was asked to explain the problems we had been having with our telephone system. I also have attached a letter he wrote to Thomas Hunt, of BellSouth concerning the problems we experienced.

Further affiant sayeth naught.

  
Julia Downs

Subscribed and sworn before me this 1 day of October, 1997.

  
Notary Public

My Commission Expires on 7/12/2001.



Susan J. Akomer  
MY COMMISSION # CC634420 EXPIRES  
July 12, 2001  
BONDED THRU TROY PAIR INSURANCE INC

**EXHIBIT "K"**

Page 2 of 4



WMFE-TV/FM  
11510 E. COLONIAL DRIVE  
ORLANDO, FLORIDA 32817-4699  
(407) 273-2300

**Mr. Thomas E. Hunt**  
Regional Director  
BellSouth  
500 North Orange Avenue, Ste 568  
Orlando, Florida 32801

**Dear Tom:**

**December 3, 1996**

Recently we experienced some exasperating moments with BellSouth. I thought you ought to know about it.

I have enclosed a copy of a memorandum from WMFE's Director of Administration, Julia Downs. She itemizes the difficulties she and WMFE experienced with BellSouth.

Surely, the instances she describes are not behaviors or procedures you condone. After your reflection on her comments, I would appreciate your thoughtful response.

By the way, before we switched from BellSouth to Sprint, we asked if BellSouth would care to negotiate in some manner to keep our business. BellSouth declined.

Best Holiday Wishes,

A handwritten signature in cursive script that reads 'Steve'.

**Stephen McKenney Steck**  
President and Chief Executive Officer

SMS/dms  
[letters]120396.doc  
Enclosure

c: Julia Downs

## EXHIBIT "K"

Page 3 of 4



### MEMORANDUM

TO: Steve Steck  
FROM: Julia Downs *JD*  
SUBJECT: Telephone Service  
DATE: November 22, 1996

This memo is in response to your questions and concerns about our telephone service.

As you know, we recently elected to change from Bell South to Sprint Metropolitan as the provider of our local network service. We made this decision based on the substantial savings to WMFE (approximately \$8,000 annually), and because the change would be transparent to us here at WMFE and to those calling WMFE. However, several things have happened that made that change *painfully* obvious.

First, the cutover was tentatively scheduled for October 17. Because I was going to be out of town beginning October 18, we decided to postpone the cutover, just in case there were any problems. Bell South was notified of this postponement. However, for some reason unknown to anyone, Bell South disconnected all service to WMFE during the early morning hours of October 22. It took three days to get service totally restored to WMFE, the work being completed just one day before the start of our Radio Membership Drive, which is totally dependent on telephone calls to generate revenue.

Second, our cutover was scheduled for November 7. Of the 43 lines that needed to be cutover, they could only complete 13 of them because of technical problems on Bell South's end. This caused us to have to schedule another cutover date on November 13. On that date, Bell South had a service technician and supervisor on site to assist with the cutover. They were both professional and efficient in working with me and Sprint United, and the remaining 30 lines were cutover at that time.

Third, Bell South terminated all of WMFE's long distance calling cards. We did not request that and it should not have been a part of the service disconnection. You, of course, were stranded out of town without a long distance calling card.

## EXHIBIT "K"

Page 4 of 4

Memorandum to Stephen McKenney Steck

November 21, 1996

Page 2

And fourth, our telephone number was temporarily eliminated from Bell South's directory assistance, which was an error on their part. We discovered this when a caller pointed it out to us.

I would like to point out that while this is a new process for the telephone companies; in my opinion there were too many unexplainable accidents on Bell South's part.

I hope this gives you a good synopsis of the problems we encountered during this process. Please let me know if you have any additional questions.

jd

# **EXHIBIT “L”**

**EXHIBIT "L"**

Page 1 of 5



George V. Head  
Vice President  
Local Market Integration  
7301 College Blvd.  
Overland Park KS 66210  
KSOPKV0104  
Phone: 913-534-6102  
Fax: 913-534-6237

June 18, 1997

Mr. Joseph M. Baker  
Vice President - Sales  
BellSouth Telecommunications, Inc.  
Interconnection Services  
675 West Peachtree Street, N. E.  
Suite 443  
Atlanta, Georgia 30375

Dear Joe:

I am writing to again express serious concern regarding recent service problems in Orlando, Florida, and to request BellSouth's review and analysis of the situation in our meeting in Birmingham on June 24th. As you know, our teams have met many times to discuss service related difficulties being encountered by Sprint Metropolitan Networks, Inc. (SMNI), and yet they continue to occur.

During a three week period from May 19 to June 6, 1997, SMNI's customers encountered three significant service interruptions related to receiving calls through the BellSouth network. In each case, Sprint's customers could receive calls directly to their Sprint numbers but calls being call-forwarded through the BellSouth network could not be completed.

In the first occurrence, an "all circuits busy" condition was created on Monday morning, May 19, when interoffice traffic was reversed in error by Bell South in conjunction with trunk additions BellSouth was installing. Customers were impacted for 3 hours and over 20 trouble tickets were received.

## EXHIBIT "L"

Page 2 of 5

The second incident, on May 30, revealed a translations problem in a BellSouth local switch whereby calls processed via the primary route were completed but the secondary route returned "no longer in service" or "can't be completed as dialed" messages. This service problem occurred for at least seven hours before it could be isolated and resolved by BellSouth.

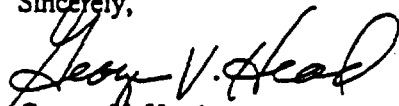
Most recently, on June 6, a simulated facilities group was removed from translations in error by BellSouth, again resulting in calls to SMNI customers being blocked for over two hours.

Attached for your review are the outage reports provided to Sprint by your account team after the first and third event. Each describes "human error" occurring in the translations support team. The second event, for which Sprint did not request a written report, occurred on May 31, 1997 and was also attributed to a translations error.

These errors by BellSouth have resulted in service deficiencies that have damaged Sprint's relationships with its end user customers and are impeding Sprint's ability to establish itself as a local service competitor in Central Florida. Even more disturbing is that these events occurred during a timeframe within which Sprint had requested, and BellSouth had agreed, to provide measurable and specific improvements in the service it provides to SMNI.

I look forward to seeing you and the BellSouth team on the 24th in Birmingham. I trust that BellSouth will have identified the irreversible corrective action on its translations process.

Sincerely,



George V. Head

cc: Melissa Closz - Sprint  
Carol Jarman - Bell South



EXHIBIT "L"



Page 3 of 5

BellSouth Interconnection Services

Memorandum

Date May 21, 1997

To Linda McGrupe  
Jerry Johnson

From Gretchen Wilson  
Telephone Number 205 988-1879  
Fax Number 205 988-7003

Subject Sprint Metro Net routing problems

Linda:

Per your request, following are details relative to the traffic overflow problem in Orlando -

The problem occurred during the provisioning of the new IT groups. The routing in the Colonial Main and Tandem office was reversed on the turn up of the new group. The traffic was rerouted through the tandem and most of the overflows cleared. We had several conversations with Steve(Sprint Metro Net) to verify he was seeing the traffic. He indicated that he was still seeing some overflows. The ACAC verified all of Sprint Metro Net's NNXs in the nine offices where we established direct trunk groups. We found overflow routing problems in 4 offices. The ACAC obtained copies of the routing requests and proceeded to get the traffic rerouted, one office at a time, to insure that we did not cause Sprint Metro Net any additional problems

To keep this same problem from reoccurring a copy of the routing request will be sent to the project manager to be included in the package for switched access. A copy of this same routing request will be provided to the switched access supervisor to be retained for the maintenance group. Switched access will verify the routing upon turn-up of any new IT group.

EXHIBIT "L"

-2-

Page 4 of 5

The SFG was successfully restored at approximately 6:15 PM EDT and the blocking of the existing Sprint Metro customers was cleared at that time.

Because the SFG had been removed, the original project for Mid Florida Pools had to be rebuilt and flowed back through the switch. This was accomplished by 7:00 PM EDT.

The following steps are being taken to guard against a recurrence of the problem discussed above:

1. Prepare and send a memo to NISC /RCMAG Directors by Friday, June 13th, to contain:
  - A. Account of the CLEC trunk outage in the Orlando Magnolia Central Office which occurred on June 6, 1997.
  - B. Require mandatory coverage for all CTG electronic technicians on Translation Bulletin No. 97-TB-46, issued May 23, 1997 and provide positive report to staff by June 20, 1997.
2. Re-transmit the Translation Bulletin 97-TB-46 to all NISC personnel by Friday, June 13th.
3. On June 11th, 1997, a second SFG was built in the 1AESS switch in the Orlando Magnolia Central Office to establish a hunt group arrangement that will provide "overflow" for CLEC trunk access.
4. Develop and deliver a package for quick restoral of the SFG in case of future outage to the RCMAG by June 20th, 1997.

We trust that the above information satisfies your request regarding the outage in the Orlando Magnolia Central Office. If you should have additional questions or concerns surrounding the outage, please let me know.



cc: Joe Baker  
Richard Warner

**EXHIBIT "L"**

Page 5 of 5

**BELLSOUTH**

BellSouth Interconnection Services      Fax 205 988-1608  
Suite 440                                      205 988-1700  
Two Chaze Corporate Drive  
Birmingham, Alabama 35264

Carol E. Jarman  
Sales Assistant Vice President  
Sprint Account Team

June 12, 1997

Melissa Cloz  
Director  
Local Market Development  
Sprint  
151 Southhall Lane #400B  
Maitland, Florida 32571

Subject:                      Sprint Metro Outage In Orlando Magnolia 1AESS

Dear Melissa:

This letter is to provide the details of the service outage to Sprint Metro in the Orlando Magnolia 1AESS office and to outline the steps BellSouth has taken to guard against a recurrence.

On June 4, 1997, BellSouth Project Manager Daryl Ducote received a call from Lori Doherty with Sprint Metro. Lori requested that two telephone numbers be added to a service order providing Remote Call Forwarding (RCF). This could not be done because the service order had been issued to complete on June 3. The Local Carrier Service Center (LCSC) did accept, however, a verbal request from Sprint Metro to place an order for RCF on the two lines. A new (N) service order (NY8FFPY5) was issued on June 6, 1997 at 1:26 PM. This N order was issued to remote call forward telephone numbers 407-481-2376 and 404-843-4817 to 407-206-2106 and 404-206-2105 respectively.

After the N service order was issued, the Service Representative realized that a change (C) service order should have been issued instead. She then canceled the N service order and issued a C service order. The C service order, (CY93T5D1), was issued to provide RCF for these lines. When the canceled N service order was received by the Recent Change Memory Assistance Group (RCMAG), the Line Translation Specialist (LTS) removed the numbers from the translations as well as the associated Simulated Facilities Group (SFG). Removal of the SFG resulted in the blocking of all incoming traffic for Sprint Metro from the RCF numbers in the Orlando Magnolia 1AESS switch.

A trouble report was received at 5:00 PM EDT from Sprint Metro. The Electronic Technician (ET) at the Unbundled Network Element Center (UNEC) called RCMAG to rebuild the SFG.

# **EXHIBIT “M”**

EXHIBIT "M"

Page 1 of 1

© **BELLSOUTH**

BellSouth Telecommunications, Inc. 404 527-7140  
Suite 4423 Fax 404 523-0348  
675 West Peachtree Street, N.E.  
Atlanta, Georgia 30375

Joseph M. Baker  
Vice President - Sales  
Interconnection Services

July 1, 1997

Mr. John Cascio  
Vice President  
Sprint  
555 Lake Border Drive  
Apopka, Florida 32703

Dear John:

On behalf of BellSouth, I would like to apologize for the recent service interruption experienced by Sprint and its local exchange customers. We value our relationship with Sprint as one of BellSouth's largest wholesale customers, and it is always our intention to provide you with service that meets your standard for customer satisfaction.

This service interruption, which occurred at 5:21pm EDT on June 24, 1997 in BellSouth's Magnolia Central Office, was caused by a work error in our RCMAG (Recent Change Memory Assignment Group), the group responsible for handling translation software. As you know, BellSouth has put into place action plans to help prevent the error from happening again. These plans include short term measures such as the requirement for supervisory approval in these situations. We are also investigating with our vendors long term measures that include enhancing the software involved. Additionally, we have made changes to our methods and procedures to reduce the likelihood of these outages.

Again, BellSouth regrets any inconvenience this service interruption caused Sprint and its customers. We are committed to work cooperatively with Sprint throughout the nine state region to provide the level of service expected by you and your customers.

Yours truly,

  
J. M. Baker

Copy: George Head, Vice President - National Market Integration, Sprint  
Carol Jarman, Sales Assistant Vice President - Sprint, BST  
Krista Tillman, Vice President - Operations, BST

# **EXHIBIT “N”**

**EXHIBIT "N"**

Page 1 of 2



BellSouth Interconnection Services      Fax 205 988-1688  
Suite 440      205 988-1700  
Two Chase Corporate Drive  
Birmingham, Alabama 35244

Carol B. Jerman  
Sales Assistant Vice President  
Sprint Account Team

July 8, 1997

Ms. Melissa Cloz  
Director - Local Market Development  
Sprint  
151 Southhall Lane Suite 400B  
Maitland, FL 32751

Dear Melissa:

I would like to follow up and provide you with a more detailed description of the events that led to the outage in the Magnolia office on June 24. The situation originated when Magna Computer called BellSouth's Small Business Services Center on June 20 to convert their service from SMNI back to BellSouth. A BellSouth representative in that office issued a disconnect (D) and new (N) order to initiate that process.

Due to that disconnect order, the office equipment for Magna Computer's telephone number was reassigned to another customer when a subsequent order flowed through our systems. When that order was processed, the service for Magna Computer as well as the entire Simulated Facility Group (SFG) was manually deleted from the switch in error. This prevented all of the customers that utilized Service Provider Number Portability (SPNP) in the Orlando Magnolia LAESS Central Office from receiving incoming calls.

The duration of the outage was approximately 2.5 hours, and our time to repair after the trouble was reported to the UNE center was approximately one hour. The SFG was reprogrammed and the service re-established at 7:40 P.M.

**EXHIBIT "N"**

Page 2 of 2

Ms. Melissa Cloz  
Page 2  
July 7, 1997

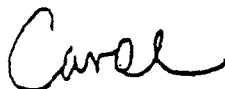
The following guidelines have been implemented to prevent future removal of SFGs in error:

1. Small Business Specialists have been retrained on the proper guidelines to use when issuing future orders.
2. On June 25, 1997, all employees in our Recent Change Memory Administration Group (RCMAG) were re-covered regarding the issues that encompass SFG usage for CLEC services in IAESS offices.
3. Effective immediately, all SFG removals must require written approval from a translations supervisor. Additionally, our staff is currently working with Lucent Technologies to provide a permanent solution which will prevent SFG removal without complex translations involvement and we will status you on that as soon as possible.

In addition to these measures, plans are also underway to reserve SFG numbers 1 through 9 exclusively for the CLFC community. We will notify you in advance of our plans to migrate SMNI to a specific SFG and will again cover our employees regarding our policy not to disconnect that range of SFGs in general and SMNI's in particular.

Let me reiterate that BellSouth regrets any inconvenience this service interruption caused. Further, we are working diligently to identify and implement corrective actions that involve not only our translations processes, but all service issues that ultimately affect Sprint and its end users customers as well.

Sincerely,





# **EXHIBIT “O”**